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Attorneys for Defendants:
CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection
with their alleged ownership or occupancy of 120 Broadway)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
RAFAEL ZUMBA

Plaintiffs,

-against-

120 BROADWAY CONDOMINIUM
(CONDO #871), ET. AL.,

Defendants.
-----X

21 MC 102 (AKH)

Index No.: 07-CV-01732

**NOTICE OF ADOPTION OF ANSWER
TO MASTER COMPLAINT**

ELECTRONICALLY FILED

PLEASE TAKE NOTICE, that defendants, CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection with their alleged ownership or occupancy of 120 Broadway), by their attorneys, White & McSpedon, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

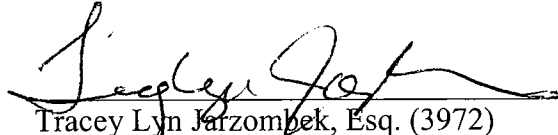
WHEREFORE, the defendants, CITIGROUP I/S/H/A CITIBANK, N.A. (solely in connection with their alleged ownership or occupancy of 120 Broadway), demand judgment dismissing the above-captioned action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 5, 2008

Yours etc.,

WHITE & MCSPEDON, P.C.

By:



Tracey Lyn Jarzombek, Esq. (3972)

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(212) 564-6633

Attorneys for Defendants

***CITIGROUP I/S/H/A CITIBANK, N.A. (solely in
connection with their alleged ownership or
occupancy of 120 Broadway)***

TO:

(Service via electronic Pacer filing)

WORBY GRONER & NAPOLI BERN, LLP

Plaintiffs Liaison

In Re Lower Manhattan Disaster Site Litigation

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212-267-3700

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All Defense Counsel